

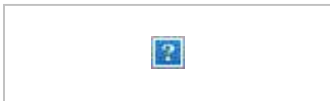
EXHIBIT D

From: [Davis, Lindsey W.](#)
To: [Sandra Gray-Rohan](#)
Cc: [Scullen, Sean](#)
Bcc: [Gateway Technical C Sandra Gray Rohan 380330 00088 02 E Mail 380330 00088](#)
Subject: RE: Document Request updated and formal [QBLLP-ACTIVE.FID39346204]
Date: Monday, May 19, 2025 1:44:19 PM
Attachments: [image001.png](#)

Good afternoon, Ms. Gray-Rohan:

This message is in response to your communications from Sunday and Monday morning. Both fact and expert/damages discovery for this matter have long-since closed. As a result, Gateway is not required, and does not intend, to respond to your below requests for information and documents. We will disclose our witnesses in accordance with any pre-trial deadlines set by the Court.

Thank you,
Lindsey



Lindsey Davis | (she/her) | Partner

lindsey.davis@quarles.com | D. 414-277-3073

Quarles & Brady LLP

411 East Wisconsin Avenue, Suite 2400, Milwaukee, WI 53202-4428

[Bio](#) | [vCard](#) | [quarles.com](#) | [LinkedIn](#)

Assistant: Mary Fingar, [608-283-2646](#)

From: Sandra Gray-Rohan <grayrohan19@gmail.com>
Sent: Monday, May 19, 2025 11:45 AM
To: Davis, Lindsey W. <Lindsey.Davis@quarles.com>; Scullen, Sean <sean.scullen@quarles.com>
Subject: Document Request updated and formal

Good afternoon. Please see the production of documents requested attached. You'll receive a paper copy of this request in the mail to follow.

Sincere blessings,

Sandra Gray-Rohan

From: Sandra Gray-Rohan grayrohan19@gmail.com
Sent: Sunday, May 18, 2025 9:21 AM
To: Davis, Lindsey W. Lindsey.Davis@quarles.com; Scullen, Sean sean.scullen@quarles.com
Subject: Request of documents needed

Good morning Lindsey and Sean, upon recent discovery and in order to prepare for the status conference I would like to make an informal request to receive documents from you. See list below:

1. The defendant's updated witness list
2. A printed copy of Sandra Gray-Rohan's employee personnel file including all and any information, without any exclusions from the file.
3. A printed copy of Kristin Gunia's complete employee personnel file including all and any information, without any exclusions from the file.
4. A printed copy of Jayne Herring's employee personnel file including all and any information, without any exclusions from the file.
5. A printed copy of AnnMarie Klyzub-Ruggierro's employee personnel file including all and any information, without any exclusions from the file.
6. A printed copy of Sandra Kolbow's (Dembroski) employee personnel file including all and any information, without any exclusions from the file.
7. A printed copy of Greg Lebrick's employee personnel file including all and any information, without any exclusions from the file.
8. A printed copy of Nathan Well's employee personnel file including all and any information, without any exclusions from the file.
9. Provide a list of all employees hired in the marketing department from 2000 to present
 - (a) copy of their job description(s)
 - (b) list the name of their supervisor(s),
 - (c) status of employment (presently working, resigned, or fired/terminated, and provide dates
 - (c) their contact information (home address, email, and phone number).
10. Provide documents sent to and received from Bjorklund Agency (3rd Party) on reclassifications, promotions, change of work assignments requested, and any correspondence for all positions held under Jayne Herring and Kristin Gunia during their employment at Gateway Technical College, past and present. Disclose all contact persons from Bjorklund involved in communication during the correspondence and their contact information. (address, phone and email).

Due to the time constraints of the date of the status conference the plaintiff has requested an informal request of documents. Plaintiff will send a formal request for production of documents to follow by mail. Plaintiff requests that you provide these documents on or before the status conference date of June 18, 2018. Please confirm that you have received the request.

Sincere blessings,

Sandra Gray-rohan